

ORIGINAL

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Attorneys for Defendant  
A.W. Chesterton Company

**FILED**  
DISTRICT COURT OF GUAM

OCT 27 2005 *MDW*

**MARY L.M. MORAN**  
**CLERK OF COURT**

IN THE DISTRICT COURT OF GUAM

CESS NAVARRO OLMO and RONNIE  
PASCUAL FERRERAS,

Plaintiffs,

vs.

A.P. GREEN INDUSTRIES, INC., A.P.  
GREEN SERVICES, INC., A.W.  
CHESTERTON COMPANY, AMCHEM  
PRODUCTS, INC., ARMSTRONG WORLD  
INDUSTRIES, INC., ASBESTOS CLAIMS  
MANAGEMENT CORPORATION,  
BABCOCK & WILCOX COMPANY,  
COMBUSTION ENGINEERING, INC., DOW  
CHEMICAL COMPANY, DRESSER  
INDUSTRIES, INC., FELITALLIC, INC.,  
FLINTKOTE COMPANY, FOSTER  
WHEELER CORP., GAF CORPORATION,  
GARLOCK, INC., GEORGIA-PACIFIC  
CORPORATION, HARBISON-WALKER  
REFRACTORIES CO., HONEYWELL  
INTERNATIONAL, INC., JOHN CRANE,  
INC., KAISER GYPSUM COMPANY, INC.,  
METROPOLITAN LIFE INSURANCE  
COMPANY, OWENS CORNING, OWENS-  
ILLINOIS, INC., PITTSBURG CORNING  
CORPORATION, QUIGLEY COMPANY,  
INC., UNITED STATES GYPSUM  
COMPANY, and VIACOM, INC.,

Defendants.

CIVIL CASE NO. CV05-00025

**DEFENDANT A.W. CHESTERTON  
COMPANY'S NOTICE OF TAG-  
ALONG ACTION; DECLARATION OF  
SERVICE**

**DEFENDANT A.W. CHESTERTON COMPANY'S**  
**NOTICE OF TAG-ALONG ACTION**

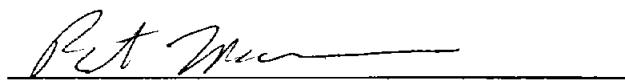
PLEASE TAKE NOTICE that on July 29, 1991, the Judicial Panel on Multidistrict Litigation entered an Order transferring all asbestos cases pending in the Federal Court to the United States District Court, Eastern District of Pennsylvania, for coordinated pretrial proceedings pursuant to 28 U.S.C. Section 1407 ("MDL Transfer Order"). That Order also applies to "tag-along actions," or actions involving common questions of fact filed after the January 17, 1991 filing of the Panel's Order to Show Cause. MDL Rule 7.5(e) provides:

Any party or Counsel in actions previously transferred under section 1407 or under consideration by the Panel for transfer under section 1407 shall notify the Clerk of the Panel of any potential "Tag-along actions" in which that party is also named or in which that Counsel appears.

The undersigned hereby notifies the Court that this case is a potential "tag-along action" which may be subject to transfer to the Eastern District of Pennsylvania. The Clerk of the Panel may either (1) enter a conditional transfer Order pursuant to MDL Rule 7.4(a), or (2) file an Order to show cause why the action should not be transferred, pursuant to MDL Rule 7.5(b).

DATED: Hagåtña, Guam, October 27, 2005.

CARLSMITH BALL LLP

  
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J. PATRICK MASON  
Attorneys for Defendant  
A.W. Chesterton Company

**DECLARATION OF SERVICE**

I, J.PATRICK MASON, hereby declare and state:

1. I am a United States citizen over the age of 18 years;
2. I am an Attorney of the law firm of Carlsmith Ball LLP.
3. On October 27, 2005, I caused to be served a filed copy of DEFENDANT A.W.

CHESTERTON COMPANY'S NOTICE OF TAG-ALONG ACTION by hand delivery to the following:

John S. Unpingco, Esq.  
Benjamin B. Cassiday, III  
Lujan, Unpingco, Aguigui & Perez, LLP  
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Anita P. Arriola, Esq.  
Arriola, Cowan & Arriola  
Suite 201, C&A Professional Building  
259 Martyr Street  
Hagåtña, Guam 96910

4. On October 27, 2005, I will also cause a copy of said documents to be served on the following by depositing same with the United States mail in sealed envelopes, postage prepaid, addressed as follows:

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c/o Corporation Trust Co.  
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Wilmington, DE 19801

Dow Chemical Company  
c/o Corporation Trust Co.  
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Honeywell International, Inc.  
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1209 Orange Street  
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A.P. Green Services, Inc.  
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1209 Orange Street  
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Asbestos Claims Management Corporation  
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c/o CT Corporation System  
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GAF Corporation  
c/o Prentice-Hall Corporation Systems, Inc.  
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c/o CT Corporation System  
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Pittsburgh Corning Corporation  
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c/o Corporation Trust Co.  
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Flexitalic, Inc.  
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Kaiser Gypsum Company, Inc.  
c/o CT Corporation System  
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Los Angeles, California 90017

Amchem Products, Inc.  
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Combustion Engineering, Inc.  
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1209 Orange Street  
Wilmington, DE 19801

Flintkote Company  
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Wilmington, DE 19801

Harbison-Walker Refractories Co.  
c/o Corporation Trust Co.  
1209 Orange Street  
Wilmington, DE 19801

Owens Corning  
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United States Gypsum Company  
c/o Corporation Trust Co.  
1209 Orange Street  
Wilmington, DE 19801

DATED: Hagåtña, Guam, October 27, 2005.



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J.PATRICK MASON